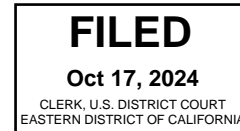


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6
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SEALED

8 IN THE UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA

10 UNITED STATES OF AMERICA,
11
Plaintiff,
12
v.
13 WILLIAM CARL JACKSON,
14
Defendants.
15

CASE NO. 2:24-cr-0286 DC

18 U.S.C. § 2114(a) – Robbery of Mail Matter and
Other Property of the United States (2 counts);
18 U.S.C. § 1704 – Possession of Mail Lock or Key
(2 counts); 18 U.S.C. § 981(a)(1)(C) and
28 U.S.C. § 2461(c) – Criminal Forfeiture

16
17
18 INDICTMENT

19 COUNT ONE: [18 U.S.C. § 2114(a) – Robbery of Mail Matter and Other Property of the United States]

20 The Grand Jury charges:

21 WILLIAM CARL JACKSON

22 defendant herein, on or about July 11, 2024, in Sacramento County, State and Eastern District of
23 California, did assault PERSON 1, a person having lawful charge, control, and custody of mail matter
24 and other property of the United States, with the intent to rob, steal, and purloin such mail matter and
25 other property of the United States, and in effecting and attempting to effect such robbery put PERSON
26 1 in jeopardy by the use of a dangerous weapon, to wit: a black and tan pistol, in violation of Title 18,
27 United States Code, Sections 2 and 2114(a).

28 ///

COUNT TWO: [18 U.S.C. § 2114(a) – Robbery of Mail Matter and Other Property of the United States]

The Grand Jury further charges: T H A T

WILLIAM CARL JACKSON

defendant herein, on or about July 31, 2024, in Sacramento County, State and Eastern District of California, did assault PERSON 2, a person having lawful charge, control, and custody of mail matter and other property of the United States, with the intent to rob, steal, and purloin such mail matter and other property of the United States, and in effecting and attempting to effect such robbery put PERSON 2 in jeopardy by the use of a dangerous weapon, to wit: a black and tan pistol, in violation of Title 18, United States Code, Sections 2 and 2114(a).

COUNTS THREE AND FOUR: [18 U.S.C. § 1704 – Possession of Mail Keys or Locks]

The Grand Jury further charges: T H A T

WILLIAM CARL JACKSON,

defendant herein, on or about the dates set forth below, in the State and Eastern District of California, and elsewhere, did knowingly possess a U.S. mail lock and key, with the intent to unlawfully and improperly use, sell, and otherwise dispose of the same, and to cause the same to be unlawfully and improperly used, sold, and otherwise disposed of, as specified below:

Count	On or About Date
3	July 11, 2024
4	July 31, 2024

All in violation of Title 18, United States Code, Sections 2 and 1704.

FORFEITURE ALLEGATION: [18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c) – Criminal Forfeiture]

1. Upon conviction of one or more of the offenses alleged in Counts One through Four of this Indictment, defendant JACKSON shall forfeit to the United States pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), all property, real and personal, which constitutes or is derived from proceeds traceable to such violations, including but not limited to, the following:

a. A sum of money equal to the total amount of proceeds traceable to such

offenses, for which defendants are convicted.


2. If any property subject to forfeiture, as a result of the offenses alleged in Counts One through Four of this Indictment, for which defendant is convicted:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or,
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to 28 U.S.C. § 2461(c), incorporating 21 U.S.C. § 853(p), to seek forfeiture of any other property of defendant, up to the value of the property subject to forfeiture.

A TRUE BILL.

/s/ Signature on file w/AUSA
FOREPERSON


PHILLIP A. TALBERT
United States Attorney

No. 2:24-cr-0286 DC

UNITED STATES DISTRICT COURT

Eastern District of California

Criminal Division

THE UNITED STATES OF AMERICA

vs.

WILLIAM CARL JACKSON

I N D I C T M E N T

VIOLATION(S): 18 U.S.C. § 2114(a) – Robbery of Mail Matter and Other Property of the United States (2 counts); 18 U.S.C. § 1704 – Possession of Mail Lock or Key (2 counts); 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c) Criminal Forfeiture

A true bill,

/s/ Signature on file w/AUSA

Foreman.

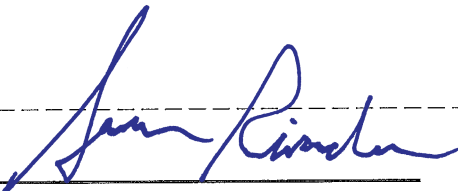
Filed in open court this 17th *day*

of October *, A.D. 20* 24

/s/ Shelly Her

Clerk.

Bail, \$ No Bail Warrant



GPO 863 525

2:24-cr-0286 DC

United States v. William Carl Jackson
Penalties for Indictment

COUNTS 1-2:

VIOLATION: 18 U.S.C. § 2114(a) – Robbery of Mail Matter

PENALTIES: A maximum of up to 25 years' imprisonment;
Fine of up to \$250,000; or both fine and imprisonment
Supervised release of up to five years

SPECIAL ASSESSMENT: \$100 (mandatory on each count)

COUNTS 3-4:

VIOLATION: 18 U.S.C. § 1704 – Possession of Mail Key or Lock

PENALTIES: A maximum of up to 10 years' imprisonment;
Fine of up to \$250,000; or both fine and imprisonment
Supervised release of up to three years

SPECIAL ASSESSMENT: \$100 (mandatory on each count)

FORFEITURE ALLEGATION:

VIOLATION: 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c) – Criminal Forfeiture

PENALTIES: As stated in the charging document